

Commissioners, gentlemen,

I am writing in reply to the recent request on 99-325 by Mr. John Wells King of Garvey Schubert Barer to have IBOC allowed at night. Sirs, I am taking this opportunity to request as a end user that this NOT be allowed.

I live in Arizona far from much of the testing that has been done with IBOC. I have had interference from the digital sidebands that cause me loss of service and difficulty in hearing regularly heard stations at my home. At present, although the interference, which sounds like rushing water on each side of the center frequency which is testing, it can be heard here.

Not only is the interference with United States stations, it also interferes with international frequencies. In the early December testing with WLW running IBOC, I was unable to listen to sports programming from Southern California that I commonly listen to, without interference from XETRA. The digital artifact was quite destructive to XETRA.

During the later testing between WLW and WOR considerable interference was noted between WORs IBOC upper sideband signal and KDWN from Las Vegas. This would cause secondary listeners, in a case of national emergency such as occurred on 9/11, would be rendered unable to retrieve information concerning the emergency. The same would be if there was an EAS message to be broadcast. The general public uses analog radio and the interference would possibly cause many listeners to be rendered unable to receive life saving notifications because of an increased noise floor due to the sideband digital transmission.

In the petition on page 3 its noted "...computer models and field tests have shown that night time use of the AM IBOC system can in certain instances, lead to intolerable levels of interference..." If this interference is going to be intolerable in many cases, at least extrapolating what could be from what I have heard, then why cause the public to lose their service and notification of emergencies in any case?

With the significant skywave that is observed on MW frequencies, I am of the opinion that digital will not work well, especially in the hybrid IBOC mode and will be destructive to the AM analog band in a way that will cause listeners to flee to other bands or entertainment venues.

I disagree with the petition on page 4 that states, "...the number of stations which would cause interference is small." I believe that all stations not running IBOC would receive detrimental interference if I can hear the sidebands on the other side of the country from the testing. This interference has been noted also in California.

It is for this reason that I believe that even the digital stations would interfere with one another in the IBOC hybrid mode.

I would like to see further testing with several adjacent frequencies with stations such as 1060 KDUS,KNX 1070 kHz, KSCO 1080

kHz or some such clustered arrangement be tested. Furthermore until testing is done with 8 or so stations on a graveyard frequency such as 1230 and 1240 clustered in a fairly close proximity, then the true effect of IBOC will not be understood.

Its for the reason that I feel testing in not only complete but I believe that real world testing has not even been accomplished that I am against the night time use of IBOC on MW frequencies at this time.

Thank You Commissioners for your time in this matter.

Kevin Redding  
1357 S. Hall  
Mesa, Arizona 85204